

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION
No. 5:24-cv-644-FL

MARK KEITH ROBINSON,

Plaintiff,

v.

CABLE NEWS NETWORK, INC. et al.,

Defendants.

**AGREED [REFILED] MOTION FOR EXTENSION OF TIME
TO FILE RESPONSE AND REPLY**

Plaintiff Mark Keith Robinson, with agreement and consent of Defendant CNN, hereby requests an extension of seven (7) days to file its response in opposition to Defendant CNN's motion to dismiss (ECF No. 8), and for a reciprocal extension of seven (7) days for Defendant CNN to file its reply thereto. FRCP 6(b)(1)(A). Under this agreed schedule, Plaintiff's response in opposition would be due on December 19, 2024, and CNN's reply would be due on January 9, 2025.

Defendant CNN has filed its substantial dispositive motion under Rule 12(b)(6), requiring thorough briefing in response. Defendant CNN has agreed to these extensions. Therefore, there is no prejudice to any party and good cause exists for this Court to grant the requested extension.

WHEREFORE, Plaintiff requests that this Court grant the extension and enter the proposed order filed herewith.

Dated: December 16, 2024

Respectfully submitted,

/s/ Jason C. Greaves
Jason C. Greaves
(by special appearance)
Jesse R. Binnall
(by special appearance)
BINNALL LAW GROUP
717 King Street
Suite 200
Alexandria, VA 22314
T: (703) 888-1943
F: (703) 888-1930
E: jason@binnall.com
jesse@binnall.com
Attorneys for Plaintiff

/s/ Anthony J. Biller
Anthony J. Biller
ENVISAGE LAW
NC State Bar No. 24,117
2601 Oberlin Road, Suite 100
Raleigh, NC 27608
T: (919) 715-1317
F: (919) 782-0452
E: ajbiller@envisage.law
Local Civil Rule 83.1(d) Attorney for Plaintiff

CERTIFICATE OF SERVICE

I certify that on December 16, 2024, a copy of the foregoing was filed with the Clerk of the Court using the Court's CM/ECF system, which will send a copy to all counsel of record.

/s/ Jason C. Greaves
Jason C. Greaves

Attorney for Plaintiff